



# **GIFTS AND HOSPITALITY POLICY**

**MARCH 2016**

**Revised October 2017**

**Revised June 2018**

**This policy reflects DAO 10/06 (revised 3 September 2009).  
This policy is to be reviewed in June 2019.**

## SUMMARY CHECKLIST

### Basic Principles

Members and staff should never receive benefits of any kind from a third party which might reasonably be thought to compromise their personal judgement or integrity. Staff should refer to the Nolan Principles of Public Life (**Annex F**). In this field, **perception is as important as reality**.

The acceptance or provision of gifts and **hospitality should further the Boards direct interest** and it should be clearly obvious that this is the case.

The general principle is that all **gifts should be refused**. However, seasonal, promotional or trivial gifts valued at less than £10, may be accepted.

Gifts in the range £10-£50 may only be accepted with the approval of the Chief Executive and gifts valued at over £50 cannot on any account be accepted.

Gifts of lottery tickets, cash, gift vouchers or gift cheques, regardless of the amount, cannot be accepted.

Gifts provided by the Policing Board must be under £100 and have the approval of the Chief Executive, except in the case of trivial promotional type items (Board pens, key rings etc.) held by Press Office.

For the purpose of this policy, hospitality refers to: meals, beverages, light refreshments of any type provided out of public funds to anyone, be they a public servant or official, representative of a public or private body or organization, or a private individual. **Hospitality does not include catering** provided in connection with Board organised meetings and events.

### Authorisation procedures, forms and the register.

**Approval levels for staff** offering or receiving hospitality are: The Chief Executive must have the approval of the Board's Chairperson, Directors must have the approval of the Chief Executive and all staff below the level of Director must seek approval from their relevant Director.

Members and staff must complete Part 1 of form A1 (Trim 371998) and forward to the authorising officer who must complete Part 2 of form A1 **before the gift or hospitality can be offered or accepted**.

Form A1 must be completed even if the gift or hospitality offered is being rejected.

The authorising officer should return the signed A1 form to the originator.

The originating officer should complete the **Register of Gifts and Hospitality** pro forma held on file in Corporate Services Branch once the gift or hospitality has been provided or received.

Expenses incurred for gifts or hospitality should not be claimed through the normal expense claim form.

Expenses will be paid by Finance on receipt of a valid payment voucher accompanied by a copy of Form A1.

## **GUIDANCE ON THE ACCEPTANCE**

### **OF GIFTS AND HOSPITALITY**

### **BY POLICING BOARD MEMBERS AND STAFF**

# GUIDANCE ON THE ACCEPTANCE OF GIFTS AND HOSPITALITY

## Introduction

### Section 1

- 1.1 The Northern Ireland Policing Board recognises that contractors and other customers of our services may extend from time to time offers of gifts and hospitality to Members and staff. The Policing Board also recognises that its Members and staff have a responsibility, in the interests of public confidence, to exhibit high standards of propriety, and carry out their role with dedication and a commitment to the Policing Board having taken into consideration the core values of: integrity, honesty, objectivity and impartiality.
- 1.2 **Section 2** of this guidance sets out the principles governing the acceptance of gifts and hospitality and provides some specific advice on how these principles should be interpreted across the Policing Board. The guidance is designed to remind Members and staff of their responsibility to exercise judgement and propriety regarding offers of gifts and hospitality. **The guidance is effective immediately but will be subject to review when required.**
- 1.3 The NICS Staff Handbook indicates that civil servants should conduct themselves with honesty and impartiality in the exercise of their duties. This also applies to Policing Board Members, direct recruits and staff on secondment from other government departments. As a consequence, they should never receive benefits of any kind from a third party which might reasonably be thought to compromise their personal judgement or integrity. In this field, **perception is as important as reality.**
- 1.4 **The fundamental principle is that no Member or Board official should do anything which might give rise to the impression that he or she has been or might be influenced by a gift or hospitality or other**

**consideration to show bias for or against any person or organisation while carrying out official duties.**

- 1.5 **Section 3** of this guidance sets out the monitoring arrangements that Directorates must put in place to ensure that the arrangements are operating effectively and that they can be seen to be operating effectively.

## **Section 2**

- 2.1 This guidance sets out good practice concerning the acceptance or rejection of gifts or hospitality, and details responsibilities and procedures for the authorisation and recording of such instances. Our standards of conduct are determined by what the Government and the public as taxpayers expect and not by what may be a common practice in the private sector.
- 2.2 External individuals acting on behalf of the Policing Board (for example, consultants, contracted staff etc) must also abide by the policy. If it is believed that an external individual may have breached the policy, the matter should be reported to the relevant Director, who will take the matter forward with the individual or his/her company. **This requirement should be notified to external individuals before they start work within the Policing Board.**
- 2.3 This guidance should also be seen as applying to **spouses, partners or other associates** if it can be argued or perceived that the gift or hospitality is in fact for the benefit of the official.
- 2.4 Any breach of the rules of conduct can lead to disciplinary action and in some circumstances can be a criminal offence.
- 2.5 The policy governing the acceptance of gifts, hospitality and awards by the Policing Board is set out in Section 10 of the Standards of Conduct Chapter of the NICS Staff Handbook

- 2.6 This Guidance focuses on the key issues and the specific rules, which all Members and staff in the Policing Board should adopt.

### **Legal Obligations and Fundamental Principles**

- 2.7 Under the Prevention of Corruption Acts of 1906 and 1916 it is an offence for an officer in his/her official capacity:

- to corruptly accept any gift or consideration as an inducement or reward for doing, or refraining from doing, anything in that capacity; or
- to show favour or disfavour to any person; or
- to receive money, gifts or consideration from a person or organisation holding or seeking to obtain a Government contract.

All of these are deemed by the Courts to have been received corruptly unless it is proven otherwise.

### **Record of gifts, hospitality, invitations, etc**

- 2.8 The Policing Board will maintain a **Register of Gifts and Hospitality** which will be available for periodic review. The Chief Executive's Office is responsible for maintaining and updating the Board's Register in respect of gifts and hospitality offered to staff and Board Members. The purpose of the Register will be to counter any possible accusations or suspicions of breach of the rules of conduct by staff. The register is subject to **Freedom of Information (FOI)** queries and staff should bear this in mind when deciding on the acceptance of any gift or hospitality. A template is attached at **Annex A** that should be used to register gifts, hospitality, invitations etc.

- 2.9 It will be the responsibility of the Senior Management Team (SMT) to ensure all staff are made aware of this guidance and that the register is in place and properly maintained and updated. The register will be published on the Board's website after each financial year end.

## Acceptance of Gifts

### 2.10 **The general principle is that all gifts offered should be refused.**

However seasonal, promotional or trivial gifts (such as calendars, diaries, pens etc), which bear Company names and/or logos of the provider of the gift and have a value of less than £10, may be accepted by individuals without the need for these to be reported or approved in advance. Acceptance of any other gift must have been approved by management (see paragraph 2.18) in advance and must be declared by the member of staff in the register.

2.11 Items in the range of **£10 - £50** may only be accepted with the approval of the Chief Executive. More expensive or substantial items, valued at more than £50 and gifts of lottery tickets, cash, gift vouchers or gift cheques, cannot on any account be accepted. All gifts offered (apart from those which are trivial or inexpensive), even if they are declined/returned need to be recorded in the register.

## Trade, loyalty or Discount Cards

2.12 Trade, loyalty or discount cards by which an officer might personally benefit from the purchase of goods or services at a reduced price are classified as gifts and **should be refused or returned to sender**.

2.13 Frequent flyer cards used by airlines can be used by staff to avail of special departure lounges and priority booking and check-in. They must **NOT make private use of any flights/air miles**, which derive from flights paid for from the public purse.

## Staff involved in the procurement or monitoring of a contract

2.14 Apart from trivial / inexpensive seasonal gifts, such as diaries, no gifts or hospitality of **ANY** kind from any source should be accepted by anyone involved in the procurement or monitoring of a contract. This

will ensure that no criticism can be made regarding bias to a particular company or supplier.

### **Gifts received in recognition of work done**

2.15 On no account should a gift or gratuity be solicited or requested. Where gifts by way of gratuities, vouchers or book tokens etc for lectures, broadcasts or similar occurrences are offered, then acceptance should be based on how much of the preparatory work for the event was done in the officer's own time, how much in official time and the extent to which the Policing Board's resources, other than, for example, use of an officially issued lap-top at home, were used in the preparation. The following guidelines should be applied:

- a) If the preparation was carried out entirely in the individual's own time and the event took place outside normal working hours at no expense to the Policing Board, it would be acceptable for the individual officer to retain the whole fee, token or other gift;
- b) If, however, the preparation was done wholly in the Policing Board's time with use of the Policing Board's resources, no gifts or fee should be accepted unless the event is carried out outside of normal working hours when a gift or token to the value of up to **£50** is acceptable; and
- c) If the preparation was carried out and the lecture etc, delivered in an officer's own time but the Policing Board's facilities were used for typing, preparation of PowerPoint / overheads etc, then a gift or token to the value of not more than **£75** is acceptable.

2.16 In the case of either b, or c, the Policing Board can, if they so choose, charge the organisation or body a fee based on the salary costs of the individual and/or the use of resources. If a series of gifts from the same source exceed the monetary limits set out above the same rules apply.

## **Reporting Gifts and Approval Process to be followed**

- 2.17 If gifts (apart from those trivial or inexpensive gifts for which approval is not required under Paragraph 2.11 of this Guidance) are received, **approval at Director level is required for staff up to and including Deputy Principal. Directors must seek approval from the Chief Executive before accepting gifts. The Chief Executive must seek approval from the Board's Chairperson before accepting gifts. In all cases form A1 which is attached at Annex C, should be completed.** If the recipient has or will reject the gift form A1 still needs to be completed. In all cases details should be included in the Register.
- 2.18 In each case submitted to him/her, the approving officer will decide in writing or email, whether to:
- a) allow the recipient to keep the gift;
  - b) return the gift to the donor with a suitably worded letter explaining why the gift cannot be accepted. A template has been attached at **Annex B** which should be tailored to suit each individual circumstance;
  - c) use or dispose of it, if possible, in or by the Policing Board;
  - or
  - d) donate the gift to a nominated Charity.

The approving officer will ensure that the details of the case and his/her decision are recorded in the Gifts and Hospitality register.

## **Hospitality**

- 2.19 The handling of offers of hospitality is recognised as being much more difficult to regulate but it is an area in which Members and staff must exercise careful judgement. In exercising this judgement it is acknowledged that there can be difficulty in distinguishing between a

"gift" and "hospitality". It is also recognised that it can be as embarrassing to refuse hospitality, as it can be to refuse a gift.

2.20 The acceptance of, for example, working lunches, should in the main cause no problem, especially if there is some official means of reciprocity and provided that it is **limited to isolated occasions** and its acceptance is in the **interests of the Policing Board**. Hospitality, which would not be acceptable, would include invitations to frequent or more expensive social functions where there is no direct link to official business (sporting events, the theatre, opera or ballet etc), particularly where these come from the same source, and those which involve travel, hotel or other subsistence expenses. For further guidance refer to the checklist at **Annex D**.

2.21 It can be argued that if officers are to achieve the best value for money in dealings with suppliers or consultants then they need to build up contacts and that it is quite legitimate for them to have a working relationship with organisations or individuals, which may involve a degree of hospitality. There may also be instances where Members and staff receive invitations to events run by voluntary organisations such as Annual Conferences or Dinners. Attendance at such events is considered an integral element in building and maintaining relationships with these sectors and any hospitality received is likely to be reasonable and proportionate, and therefore acceptable. Additionally, very occasional acceptance of meals or tickets to public sporting, cultural or social events may be accepted if attendance is justified as being in the Policing Board's particular business interest. But it will be for the officer and his/her managers to demonstrate clearly that acceptance was in the Policing Board's interest.

2.22 **The main point is that in accepting hospitality Members and staff need to be aware of and guard against, the dangers of misrepresentation or perception of favouritism by a competitor of the host.**

2.23 To sum up, in deciding whether hospitality can be accepted, staff should consider if it:

- a) is likely to help business effectiveness;
- b) places no obligation or perceived obligation on the recipient;
- c) is not frequent, lavish or prolonged;
- d) is unconnected with any decision affecting the organisation or the individual offering it;
- e) can be justified; and
- f) provides benefits to the Policing Board, which outweigh the risk of possible misrepresentation of the hospitality.

### **Reporting Hospitality and Approval Process to be followed**

2.24 When in doubt about accepting hospitality or an invitation line management should be consulted. In **all instances** where other than, for example, infrequent working lunches, is offered, the **approval of the relevant Director for staff up to and including Deputy Principal the Chief Executive for Directors, and the Board's Chairperson for the Chief Executive, should be sought using form A1 which is attached at Annex C.** Even if the recipient has or will reject the offer of hospitality, they should still complete form A1, and ensure that details are included in the Register. It is particularly important to ensure that the Policing Board is not over-represented at an event or function and care should be taken to ensure that this does not happen, for example, by enquiring from the host as to other staff who have received similar invitations. To guard against the multiple acceptance of invitations to the same event, each Director should make arrangements to ensure that corporate consideration is given to all invitations.

## **Awards or Prizes**

2.25 Staff should consult with their line management if they are offered an award or prize in connection with their official duties. They will normally be allowed to keep it provided:

- a) there is no risk of public criticism;
- b) it is offered strictly in accordance with personal achievement;
- c) It is not in the nature of a gift nor can be construed as a gift, inducement or payment for a publication or invention to which other rules apply.

2.26 A process as outlined in Paragraph 2.19 should be followed.

### **2.27 Acceptance of Gifts and Hospitality by Board Members**

Members may only accept gifts or hospitality, with prior approval of the Chairperson or in their absence the Vice-Chairperson. The Chairperson and the Vice Chairperson must seek approval from the Chief Executive. In all cases form A1 (Part 1) which is attached at Annex C, should be completed.

Members must advise the Chief Executive's Office of the provision of gifts or hospitality so that a record can be made in the Register. Annex A details the information required.

Gifts from foreign visitors can be accepted without prior approval, providing they are of nominal value and ceremonial or commemorative in nature. These gifts should be retained by the Board whenever they are not specifically gifted to an individual.

## **Section 3**

### **Monitoring arrangements**

3.1 The Register of Gifts, Hospitality and Awards will be subject to the following monitoring arrangements.

- The Chief Executive's Office will be responsible for holding the Policing Board Register and will update it in respect of Policing Board Members.
- Each Director will be responsible for ensuring that the Register is completed for all staff within their Directorate.
- The Chief Executive will be responsible for reviewing the Policy on an ongoing basis.
- Under the NIPB Standing Orders it is the responsibility of the Audit and Risk Management Committee to periodically review the Members Hospitality, Gifts and Entertainment Register.
- The Chief Executive's Office will seek Board members returns (including nil returns) regarding Gifts and Hospitality on a quarterly basis for ARM Committee reporting purposes.

**GUIDANCE ON THE PROVISION**

**OF GIFTS AND HOSPITALITY**

**BY POLICING BOARD MEMBERS AND STAFF**

## 1. GUIDANCE ON THE PROVISION OF HOSPITALITY AND GIFTS

1.1.1. **It is the responsibility of the individual Branches/Members organising the activity to obtain the necessary approval.**

1.1.2. The Accounting officer has delegated authority for expenditure on hospitality and events carried out by the Board. When considering requests for official hospitality of people outside the civil service, the Accounting Officer will apply the following considerations:

- the function must be in the **direct** – though not necessarily the immediate – interests of the Board;
- where Board officials and Members participate in the entertainment as hosts, **their numbers should be kept to the minimum necessary.** Normally the outside (non-Civil Service) **guests should outnumber the hosts**, though occasionally equal numbers of officials and guests may be appropriate. Only in **exceptional** circumstances should the proposed number of Board officials present exceed the number of outside guests.

### 1.2. Approval form

1.2.1. An approval form is included in **Annex E** of this guidance - this must be completed for all hospitality where the cost is expected to exceed **£50**. The form must be approved by the Accounting Officer prior to any expenditure being incurred and retained by the Branch or Member organising the event for the purposes of subsequent audit inspection. Where the Accounting officer is providing hospitality, then the Director of Resources must authorise the request.

**1.3.** This approval form is not required in circumstances where the cost of meals or refreshments is already built-in to the price for a training course, conference etc provided by a third party.

#### **1.4. Management Hospitality**

1.4.1. Strictly limited hospitality for fellow NICS officials or Members at public expense is allowed on special occasions or for special purposes. Prior approval must be sought from the Accounting Officer for expenditure on management hospitality **up to a limit of £10.00 per head where supplied by the Board's caterer and otherwise the Board's daily subsistence allowance.**

1.4.2. Approval should be given only when it is regarded as conducive to the Board's Management Statement and Financial Memorandum, examples might include:

- working lunches to carry forward Board business either internally or with representatives of other Government Departments; or
- meetings with outside bodies and agencies or overseas visitors and guests;

1.4.3. Management hospitality must always be used sparingly and at modest cost, using Board facilities whenever possible.

## **1.5. General meetings**

1.5.1. It is sometimes necessary for officials and members to host morning or afternoon meetings to which representatives of, the Board, civil servants in an unofficial capacity (e.g. Trade Union representatives) or persons outside the Board are asked to attend. The provision of tea/coffee and biscuits/scones at Board expense at meetings of this kind is permissible.

1.5.2. Modest hospitality may also be provided at internal meetings to facilitate business needs if it is considered to be cost effective and in the interests of efficiency.

## **1.6. Working Lunches**

1.6.1. Where it is simply not possible to accommodate meetings, other than during lunchtime, staff at Director and above may consider it cost effective and in the interests of efficiency to provide a modest snack/lunch for members/officials with costs kept to a minimum. This might typically involve sandwiches/finger buffet, and tea/coffee. Approval will not be given where the meeting does not include as a minimum 1 member or other external party

1.6.2. The cost per person of lunchtime meetings including the provision of refreshments, should not exceed £10.00 per head where supplied by the Board's caterer and otherwise the Board's daily subsistence allowance.

## **1.7. Training Courses/Development Days/Seminars/Work Shops/Conferences**

1.7.1. In general, the provision of meals and refreshments in these circumstances should be reasonable and not exceed £6.00 per head where supplied by the Board's caterer and otherwise the Board's daily subsistence allowance.

1.7.2. Where a staff canteen is not available, refreshments provided at morning or afternoon sessions should be limited to tea/coffee and scones/biscuits. Lunch may be provided if it facilitates the running of the course.

## **1.8. Dining – internal and external venues**

1.8.1. Internal conference and dining facilities should be considered as a first choice for entertaining guests, particularly when numbers are relatively small. For example, conference rooms or boardrooms in Government buildings should be used if available, and providing sandwiches or a snack meal must be from the Board's caterer.

1.8.2. In order to ensure value for money, services provided in-house should fall within the following standard price ranges:

- management hospitality **£10.00 per head** ;
- sandwich lunch **£10.00 per head**;
- evening meal **£25.00 per head**

1.8.3. These figures do not include the cost of any drinks and the normal expectation is that alcoholic drinks should only be provided at Board expense for evening meals. If external contractors are used, the food provided will be

of a similar standard to that which would be provided in-house but it is recognised that the cost per head will be greater to cover the cost of contractor staff.

1.8.4. Unless there are compelling circumstances, such as the availability of particular facilities, expensive hotels and restaurants should be avoided when entertaining guests and, if available, a fixed or limited choice menu at a set price should be selected.

1.8.5. When guests are entertained at hotels, restaurants or similar venues, the total cost per head including meal and refreshments should be within the following financial limits:

- Lunch - up to a maximum of **£12.50 per head**; and
- Dinner - up to a maximum of **£25.00 per head**.

In normal circumstances reimbursement of expenditure for alcohol will only be permitted up to 20% of the total cost of the meal.

## **1.9. Recruitment Board Panel Members**

1.9.1. Light refreshments consisting of tea/coffee and biscuits/scones may be provided to recruitment panel members. Separate written approval is not necessary in these circumstances.

1.9.2. It is recommended that members of panels should not normally be provided with lunch, but each case should be considered separately, taking into account factors like time constraints prohibiting the panel taking lunch or the panel including an outside assessor.

## 1.10. Farewell Parties

1.10.1. Farewell parties for civil, other public servants and members may not be funded from public funds and all such occasions should be treated as private ventures. This remains the position whether or not a proportion of the guests are “outsiders”.

## 1.11. Authorising expenditure on Official Gifts

1.11.1. Gifts of a trivial or inexpensive nature (**not greater than £10**) can be provided and examples of this would include pens or other stationery provided at training events which promote the work of the Board.

1.11.2. Official gifts should not be regarded as part of the normal conduct of Board business - gifts to Members or officials within the Board would not usually be deemed to fall within normal conduct. It may be the case though that some form of acknowledgement or recognition should be provided e.g. to a person outside Board who has presented a seminar without charging a fee.

1.11.3. In these circumstances, it may be appropriate to provide a modest gift up **to a maximum value of £50 per individual or group of individuals** but prior approval for doing so must be sought from the Accounting officer.

1.11.4. For gifts costing more than £50, the approval of the relevant Director or Accounting Officer is required.

1.11.5. Prior approval must be obtained from the DoJ, where the cost of the proposed **gift exceeds £100. This is in line with the Board’s delegations from DoJ and the standard approval form for exceeding delegations should be used.**

1.11.6. All offers of gifts over £10, whether accepted or rejected, must be entered on the Gifts Register. Gifts provided which are of a trivial or promotional nature and are valued at less than £10 does not need to be reported in the Register. These promotional gifts are monitored and controlled by Press Office and all staff are required to comply with the Press Office internal control mechanisms for the approval and issue of these items. In all cases form A1 (Part 1) which is attached at Annex C, should be completed. In each case submitted, the approving officer is required to complete form A1 (Part 2) which records whether the request has been approved or refused.

1.11.7. In line with the Policing Board Management Statement and Financial Memorandum, the financial limit for the provision of gifts is up to £100 and can only be provided with the approval of the Chief Executive.

## **1.12. General rules**

1.12.1. **Tobacco** products should not be provided from public funds under any circumstances.

1.12.2. **Alcohol** should not be provided for lunches or other daytime activities. For evening dinner or events, it is permissible to provide alcohol at a reasonable level and cost. In normal circumstances reimbursement of expenditure for alcohol will only be permitted up to 20% of the total cost of the meal.

1.12.3. All **service charges/tips** included or otherwise in a restaurant or hotel bill, may be paid at the discretion of the member/official, but will **NOT** be reimbursed by the Board.

1.12.4. **NIPB Procurement** policy for expenditure on goods and services in respect of quotations etc applies equally to hospitality expenditure.

1.12.5. No **spouses, partners or other associates** of Board officials or Members should receive official hospitality other than in exceptional circumstances with the specific agreement of the Accounting Officer.

1.12.6. Staff and Members cannot claim any **subsistence allowance** where lunch, dinner, refreshment etc has been provided at public expense.

1.12.7. Speakers and distinguished guests at conferences and courses may be invited to lunch and/or dinner, including drinks, at board expense. However, an official or member who is attending other than as organiser or host will **not normally be reimbursed** for any hospitality which he/she offers at such a function.

1.12.8. **Public funds should not be used** to provide hospitality for visits to theatres, sporting events or other forms of public entertainment.

1.12.9. Hospitality of any kind should not normally be provided to companies or suppliers by anyone involved in the **procurement or monitoring of NIPB contracts**. However, where there is a long-term association with a supplier on a partnership basis, it is acceptable to offer occasional hospitality where this can be justified in the interests of the Board.

### **1.13. Situations not covered by guidelines**

1.13.1. It is recognised that there may be cases where, in the interests of the Board, flexibility in interpretation of the guidance may be necessary. However,

prior approval for such situations must be obtained in writing from the Accounting Officer as per Annex E.

1.13.2. In addition to the normal information required, the request should clearly detail:-

- why the request falls outside the boundaries of what is normally allowable;
- why it is considered necessary to provide such hospitality;
- how it will directly benefit the Board; and
- the expected consequences of the request being refused.

#### **1.14. Classification and Identification of Hospitality and Events Expenditure**

1.14.1. All invoices submitted for payment must include the following information clearly identified:

- whether it is hospitality (government or non-government location), catering, conference, etc;
- the purpose of the event;
- copy of the signed approval form; and
- the names of attendees.

1.14.2. VISA (or other credit/debit card) receipts on their own do not represent adequate audit evidence to support the expenditure incurred. Invoices from

suppliers must always be submitted to confirm the split between food and alcohol.

1.14.3. Hospitality expenditure must be separately identified in the Board's accounts for reporting purposes and therefore should not be coded to other areas such as general expenses.

1.14.4. Hospitality in relation to Board, Committee and other meetings, including working lunches, should be allocated to the relevant catering for meetings expenditure code.

1.14.5. All other hospitality and gifts should be allocated to the hospitality code.





**Template for Return of Offer of Gift/Hospitality**

(The content of this template should be tailored to suit each circumstance)

Contact name	Name of Business
Name of company	Director/Head of Department:
Address of company	Office Address
Date	
Dear	
The Northern Ireland Policing Board operates a Gift and Hospitality Policy to ensure high standards of propriety in the conduct of its business.	
On account of public confidence, perception is as important as reality and because of this I am obliged to return your offer of <u>INSERT: Name of gift / hospitality.</u>	
This is not in any way meant to offend or to imply that your [gift/hospitality] was offered in anything but the utmost good faith, but is designed to protect both individual members of staff and the Northern Ireland Policing Board. I hope you will accept our response in that spirit and that we can look forward to continued effective working relationships.	
Yours .....	

**ANNEX C**

(Part 1 to be completed by Members and staff offering or receiving gifts or hospitality – part 2 to be completed by approving officer)

<b>PRIOR APPROVAL FOR GIFT/HOSPITALITY FORM A1 (Part 1) DETAILS</b>	
Offered to:	
Name of ultimate recipient if not as above (ie if gift or hospitality passed on to someone else):	
Date of event or gift offered:	
Who made the offer:	
Description of offer:	
Why was the offer made:	
Estimated/actual value of offer:	
State whether offer was declined:	
Is there a current/potential contract with the donor? If yes provide details:	
Signature:	Signed: Date:

**PLEASE TURN OVER FOR PART 2 TO BE COMPLETED BY THE APPROVING OFFICER**

<b>PRIOR APPROVAL FOR GIFT/HOSPITALITY FORM A1 (Part 2) OUTCOME</b>	
Decision: (Approved/Not Approved)	
Reasons why approval has/has not been granted:	
Is gift being returned? If so, a letter should be issued (template at Annex B to be used)	
Has the gift been used or disposed of? If so give details:	
Has the gift been donated to a nominated charity?	
Has the Gifts and Hospitality register been updated?	
Signature of Approving Officer:	Signed: Date:

**NB: FORM NOT VALID UNLESS BOTH PARTS 1 AND 2 HAVE BEEN COMPLETED**

## Hospitality Checklist

Type of gift/hospitality	Approval required	Guidance reference	
		Acceptance	Provision
1. Gifts provided up to £100	Chief Executive		1.5
2. Gifts received up to £10 e.g. pens, calendars etc.	No approval required	2.11	
3. Awards provided as part of the PSNI Student Officer Graduation Ceremony are not regarded as gifts	Chief Executive		
4. Modest hospitality is not regarded as conventional hospitality (eg catering for small meetings).	Head of Branch	2.2	1.6
5. Catering for Board, Committee and other meetings is not regarded as conventional hospitality	Director or Chief Executive	2.2	1.6
6. More formal lunch or dinner, by prior invitation.	Prior approval required from Director or Chief Executive as appropriate.	2.20 to 2.24	2 and 3
7. Hospitality for a team	Prior approval required from Chief Executive.	2.23	1.1,1.2 and 1.3
8. Commemorative or similar occasion organised by contractor, consultant or supplier (eg to celebrate an anniversary, opening or handover.	Prior approval required from Director or Chief Executive as appropriate.	2.20 to 2.24	
9. Trade promotion on company's premises with meals or drinks.	Prior approval required from Director or Chief Executive as appropriate.	2.20 to 2.24	
10. Annual dinner of Professional Institute or Association: <ul style="list-style-type: none"> <li>• where the officer is a guest of the Institution or Association</li> <li>• where the officer is a guest of a particular consultant, contractor or supplier.</li> </ul>	Prior approval required from Director or Chief Executive as appropriate.	2.20 to 2.24	
11. Overseas visits to inspect manufacturers' products/premises.	Prior approval required from Chief Executive.	2.20 to 2.25	
Form A1: Gifts and Hospitality Approval Form and Gift and Hospitality Register must be completed on all occasions.			
<b>Examples where hospitality may not be accepted (not a prescriptive list)</b>			
*Leisure Events            * Complimentary Tickets *Sporting Events        *Weekend breaks or holidays, whether paid for or not.  (very occasional acceptance of meals or tickets may be accepted - see Acceptance paragraph 2.22)			

**ANNEX E**

**NORTHERN IRELAND POLICING BOARD**

**APPROVAL FORM FOR HOSPITALITY COSTING MORE THAN £50**

<b>Directorate/Branch:</b>		
<b>Name of person requesting approval:</b>		
<b>Telephone number / extension:</b>		
<b>Date request submitted:</b>		
<b>Type of function i.e. Hospitality Government or non-Gov't; Catering; Conference etc.</b>		
<b>Cost Centre to be charged – code and description:</b>		
<b>Date of function:</b>		
<b>Time of function:</b>	<b>From:</b>	<b>To:</b>
<b>Venue/location of function:</b>		
<b>Total number of people attending:</b>		
<b>Number of external visitors – see Note 3 below:</b>		
<b>Nature of hospitality to be provided:</b>		
<b>Reason for expenditure i.e. what is the purpose of the event and what are the expected benefits to the Board:</b>		
<b>Total estimated cost – see attached sheet</b>		
<b>Hospitality and events expenditure exceeding £50</b>		Signed:
<b>Approved by Accounting Officer</b>		Date:

1 - Further information should be provided on additional schedules if it is considered necessary for the full and proper understanding of the request.

2 - This form should be retained by the Branch organising the event for the purposes of subsequent audit inspection.

3 - Names of individuals or organisations may be omitted if essential for security reasons – a statement to this effect should be entered instead.

<b>NORTHERN IRELAND POLICING BOARD</b>	
<b>BREAKDOWN OF COSTS FOR HOSPITALITY COSTING MORE THAN £50</b>	
<b>Directorate/Branch:</b>	
<b>Name of person requesting approval:</b>	
<b>ITEM</b>	<b>£</b>
Room hire	
Hotel and accommodation costs	
Food	
Beverages	
Alcohol	
Event management	
Travel and subsistence	
Printing and stationery	
Other – please specify	
<b>TOTAL</b>	

## Nolan Principles of Public Life

- **Selflessness** - Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other benefits for themselves, their family or their friends.
- **Integrity** - Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.
- **Objectivity** – In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.
- **Accountability** – Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.
- **Openness** – Holders of public office should be as open as possible about all the decisions and actions they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.
- **Honesty** – Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.
- **Leadership** – Holders of public office should promote and support these principles by leadership and example.